

IN THE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
TERRE HAUTE DIVISION

DOUG SPRINGER

Plaintiff,

V.

VIGO COUNTY HEALTH DEP'T

Defendant.

No. 2:21-cv-00398-JMS-MJD

DEFENDANT'S PRELEMINARY WITNESS AND EXHIBIT LIST

COMES NOW Defendant, by its counsel, and submits its preliminary witness and exhibit list in this cause.

Preliminary Witness List

1. The Defendants, who may be contacted in care of its counsel. Joni Wise, the Health Department Administrator, would have knowledge of the facts and circumstances surrounding this case. Dr. Darren Brucken, MD is the Health Officer for Vigo County and would have knowledge of the facts and circumstances surrounding this case.
2. The plaintiff, who would have knowledge of the facts and circumstances surrounding this case.
3. Any and all persons listed in the Plaintiff's initial disclosures
4. Any and all persons necessary for impeachment or rebuttal, or for authentication of documents.

5. As discovery is ongoing, the defendant reserves the right to supplement or amend this witness list as information comes in. Defendant will timely notify plaintiff as these persons become known.

Preliminary Exhibit List

1. All documents attached to any filing in this case.
2. All documents provided by a 3rd party or the plaintiff in this matter, including but not limited to documents associated with Facebook page of the defendant or comments made by the Defendant on the Vigo County Health Dep't Facebook page.
3. All depositions and their exhibits.
4. All responses to Interrogatories.
5. All stipulations and responses to Requests for Admissions.
6. The Complaint and Answer to Complaint in this matter.
7. All affidavits and verified documents in this case.
8. All documents noted by the plaintiff in its disclosures and/or or any exhibit lists.
9. Any and all documents necessary for purposes of impeachment or rebuttal.
10. As discovery in this cause in ongoing, the defendant reserves the right to supplement or amend this list. The plaintiff will be notified of any changes in a timely fashion.

WHEREFORE, the defendant submits its preliminary witness and exhibit list, and requests all proper relief.

/s/ Michael J. Wright
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